

Department of Public Health
and Human Services

Section:
CASE MANAGEMENT

FOOD STAMP PROGRAM

Subject:
≥Program Integrity Reviews

Supersedes: FS 1508-2 (08/01/01)

References: 7 CFR 275.12(g); 7 CFR 273.2 (d); 7 CFR 273.8 (h)

GENERAL RULE -- Program Integrity (PI) reviews are conducted on a statistical sampling of cases. The reviews provide:

1. A systematic method of measuring the validity of the food stamp caseload;
2. A basis for determining error rates;
3. Information to base corrective action plans at all levels of administration; and,

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4. A basis for establishing the State Agency's eligibility for high performance bonus money.

**SHARED
GOALS**

The Food Stamp Unit and the Program Integrity Unit share the common goal of improving the payment accuracy of food stamp cases by:

1. Making every reasonable effort that each case selected for review is eligible and receiving the correct allotment; and,
2. Maintaining the integrity of Program Integrity rules and regulations.

**FAILURE/ REFUSAL
TO COOPERATE**

When a participant refuses or fails to cooperate with the PI review, the PIA will send a letter to the appropriate Office of Public Assistance (OPA) informing the OPA of the participant's refusal/failure to cooperate. The OPA Case Manager must send timely notice of adverse action and close the food stamp case.

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NOTE: If a household does not cooperate with a Program Integrity review for the Food Stamp Program and the case is open on TANF and/or Medicaid, the OPA Case Manager should refer to the program policy manual for the policy for each program.

**SENDING CASE
FILES WITHIN
THREE DAYS**

The OPA sends the case file to the Program Integrity Auditor (PIA) within three calendar days after being notified (phone, e-mail, or letter) the case was selected for review.

**PROGRAM
INTEGRITY
REVIEWS**

The PIA returns the case file to the OPA within three calendar days of receipt.

The Program Integrity Auditor reviews information gathered from all sources (e.g., case file, TEAMS, collateral contacts, etc.) and determines whether food stamp eligibility is determined correctly.

The PIA contacts the OPA, if needed, to:

1. Notify the OPA if the case was dropped due to inability to locate;
2. Communicate information discovered relevant to any assistance program that could affect eligibility and benefit amount;

NOTE: Contact will be made promptly if the information could cause a continuing error.

3. Provide feedback to allow for the correction of the errors if one error offsets another error resulting in a no dollar error; and,
4. Work cooperatively with all parties involved in review process.

NOTE: The Regional Policy Specialist (RPS) may be consulted by the OPA (following OPA protocol) or the PI Lead Worker.

The PIA submits the findings and the PI review file to the PI Lead Worker within 45 calendar days after the case was assigned for review. The PI Lead Worker determines if the findings of the review are correct.

NOTE: The time frames given are guidelines. Federal regulations require PI to transmit the case to the Food and Nutrition Service (FNS) within 95 calendar days after the month the case was selected for review. **Case files are forwarded to the next step in this process as soon as possible.** Some of the steps may take longer than indicated.

**≥FINALIZED
CORRECT CASES**

When the case is determined to be correct, the findings are finalized. A *smiley face* is sent to the OPA and/or the RPS.

**≥ERROR
RESOLUTION
PROCESS**

The PI A contacts the PI Lead Worker to discuss the case circumstances in order to find the case correct. If they cannot find the case correct, the PI Lead Worker contacts the OPA and schedules a phone conference call to discuss the case. The OPA informs the PI Lead Worker if the OPA protocol requires the County Director, Supervisor, and/or RPS to be involved in the conference call.

The PI Lead Worker sends an email with the date/time of the scheduled conference call to the following: OPA Management designee; PI Reviewer; RPS; and designees of the Food Stamp Unit. The email includes a summary of the review findings.

When the OPA and PI agree the case is in error, the finalized error is forwarded electronically to the Food Stamp Unit designee to distribute to: OPA Management; RPS; Quality Assurance Reviewers; and the Food Stamp Unit. The Food Stamp Unit designee also sends the Food Stamp Program Integrity Error Response Report electronically at this time. This report must be completed and signed by the OPA Case Manager and Supervisor and mailed to the Food Stamp Unit designee by the due date listed on the form (10 days from when the form is sent). The purpose of the report is to use information from the reports to improve payment accuracy.

≥RESOLVING ISSUES

There may be times when the Program Integrity Auditor has verification/information that is not in the case file. This verification/information may need to be faxed to the OPA prior to the conference call for discussion purposes. The decision whether or not to fax the verification to the OPA is made by the PI Lead Worker and the Food Unit designee.

When a PI procedural issue and/or program policy issue arises that requires FNS guidance, it is the responsibility of the PI Lead Worker to obtain clarification from FNS. It is the Food Stamp Unit designee's responsibility to obtain clarification from FNS regarding all policy issues. The PI Lead Worker and the Food Stamp Unit designee decide who will request clarification from FNS for joint issues.

≥TRACKING PI REVIEWS

Food Stamp Unit designees:

1. Track causes of errors for training purposes;
2. Meet and consult with Regional Policy Specialists and Central Office Policy Specialists as needed to share data and improve payment accuracy; and,
3. Review accuracy and timeliness of reviews resulting in over payments.

Quality Assurance Specialists complete a TEAMS review of the error cases 90 calendar days after the error was finalized to assure the accuracy of the case.

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